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November 5, 2021 VIA CM/ECF

The Honorable Jessica S. Allen **United States District Court** for the District of New Jersey 50 Walnut Street Newark, NJ 07102

Re: Dong, et al. v. Johnson, et al., 2:17-cv-02092-ES-JSA

Dear Judge Allen,

The parties write respectfully in response to the Court's October 15, 2021 Order directing the parties to submit a joint letter on or before November 5, 2021 that sets forth the status of finalizing the Proposed Settlement Agreement. See D.E. 122.

Following the Settlement Conference on October 14, 2021, the parties have resolved all substantive settlement terms and are in the process of preparing the final agreement for execution by the parties. The parties expect the agreement will be fully executed by November 12, 2021. The parties will therefore submit an additional joint letter by November 12, 2021 to advise the Court of proposed next steps, including the parties' anticipated forthcoming motion for preliminary class certification and preliminary settlement approval.

Respectfully submitted,

/s/ Ira J. Kurzban

IRA J. KURZBAN

(admitted pro hac vice)

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*SO ORDERED.

November 9, 2021

/s/ Jessica S. Allen

United States Magistrate Judge